

SO. CAL. EQUAL ACCESS GROUP  
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Attorneys for Plaintiff  
JARDINE GOUGIS

**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA**

JARDINE GOUGIS,  
Plaintiff,

vs.

PAUL NETHERTON D/B/A FULL  
CIRCLE THRIFT; ROBERT E.  
DONNERSTAG, AS TRUSTEE OF THE  
DONNERSTAG FAMILY TRUST; and  
DOES 1 to 10,  
Defendants.

**Case No.: 2:24-cv-01948-JFW (JCx)**

**Plaintiff's Notice of Motion and Motion  
for Default Judgment by Court**

Date: August 18, 2025  
Time: 1:30 p.m.  
Courtroom: 7A

Honorable Judge John F. Walter

To Defendant ROBERT E. DONNERSTAG, AS TRUSTEE OF THE  
DONNERSTAG FAMILY TRUST and the attorneys of record, if any: Please take notice  
that on August 18, 2025, at 1:30 p.m., or as soon thereafter as this matter may be heard  
by this Court located at 255 East Temple Street, Los Angeles, California, Plaintiff  
JARDINE GOUGIS will present Plaintiff's motion for default judgment against  
Defendant ROBERT E. DONNERSTAG, AS TRUSTEE OF THE DONNERSTAG  
FAMILY TRUST. The Clerk has previously entered the default on said Defendant on  
June 12, 2025 (Dkt. #18).

1 At the time and place of hearing, Plaintiff will present proof of the following  
2 matters: (1) Defendant ROBERT E. DONNERSTAG, AS TRUSTEE OF THE  
3 DONNERSTAG FAMILY TRUST is not a minor or incompetent person or in military  
4 service or otherwise exempted under the Soldier and Sailor's Civil Relief Act of 1940;  
5 (2) Defendant ROBERT E. DONNERSTAG, AS TRUSTEE OF THE DONNERSTAG  
6 FAMILY TRUST has not appeared in this action; and (3) Plaintiff is entitled to judgment  
7 against said Defendant on account of the claims pleaded in the complaint, to wit: a  
8 violation of the Americans with Disabilities Act, the Unruh Civil Rights Act, the  
9 California Disabled Persons Act, the California's Unfair Competition Act, and  
10 Negligence.

11 The Plaintiff seeks a judgment in the amount of \$4,000.00 in statutory damages,  
12 \$2,525.00 in attorney's fees, and \$660.00 in costs as set forth in the attached Declaration  
13 of Jason J. Kim and an Order directing the Defendant to: make alterations in such a  
14 manner that, to the maximum extent feasible, the goods, services, facilities, privileges,  
15 advantages, or accommodations offered by Defendant are readily accessible to and usable  
16 by individuals with disabilities at the property located at or about 2245 Lake Ave.,  
17 Altadena, California. This motion is based on this notice, the declarations submitted in  
18 support of this motion, and other matters which may be presented at the hearing.

19 Notice of the original motion for default judgment by court was served on  
20 Defendant ROBERT E. DONNERSTAG, AS TRUSTEE OF THE DONNERSTAG  
21 FAMILY TRUST on July 14, 2025, by first class United States Mail, postage prepaid.  
22

23 Dated: July 14, 2025

**SO. CAL. EQUAL ACCESS GROUP**

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25  
26 By: /s/ Jason J. Kim  
27 Jason J. Kim, Esq.  
28 Attorneys for Plaintiff